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May 15, 2025

VIA ECF

The Honorable Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

Re: Piney, et al. v. City of New York, et al., Case No.: 1:25-cv-00671-DEH-SLC

Dear Judge Cave:

We represent Plaintiffs and write jointly with Defendant Target Corporation ("Target") to respectfully request a brief stay of this action **as to Target** until June 27, 2025.

The parties have been engaging in substantive settlement negotiations and have scheduled a mediation to take place on June 27, 2025. The parties are hopeful they can resolve all claims in this case against Target at the mediation. To preserve resources, the parties respectfully request this brief stay so they can focus their efforts on reaching a resolution of all claims against Target in the case.

This stay does not affect any other deadlines in the case as the Court has not yet set a date for Defendants to answer or otherwise respond to the Second Amended Complaint.

We thank the Court for its time and attention to this matter and are available at the Court's convenience.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'I. Huot', written over a horizontal line.

Innessa M. Huot

cc: All counsel of record (via ECF)

The parties' request at ECF No. 446 is granted. This matter is stayed as to Defendant Target Corp. until June 27, 2025 pending the upcoming mediation.

SO ORDERED. 5/16/25

A handwritten signature in blue ink, appearing to read 'Sarah L. Cave', written over a horizontal line.

SARAH L. CAVE
United States Magistrate Judge